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In re:

COLLIN A. ABRAHAM  
KELLY A. ABRAHAM

Debtors

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Case No: 18-30417 RG

**HEARING DATE: 2/20/2019**

**OBJECTION TO CONFIRMATION OF PLAN**

Mortgagee BRISC, by and through counsel, Pennington Law Group, hereby tenders Objection to Confirmation of the proposed Plan herein upon one or more of the following grounds as applicable.

1. BRISC joins the previously made Objections.
2. The Proposed Plan fails to provide an adequate valuation of the 23 Connel Drive, West Orange, New Jersey, 07052.
3. The Proposed Plan fails to disclose the value of the business owned by the debtors.
4. The Proposed Plan fails to provide adequate information regarding the profits and losses of the business. Furthermore, the Proposed Plan does not set forth what assets and liabilities, if any, are held by the business.
5. The underlying loan application and Note were extended to Pollen Nation Corporation and are therefore not the proper subject of the bankruptcy action instituted by individual debtors Collin and Kelly Abraham.

Mortgagee expressly reserves its rights and respectfully request that this Honorable Court establish a briefing schedule, valuation hearing or other procedure to resolve the Mortgagee's objection(s) and hereby requests that the Debtors' Chapter 13 plan in its present form be denied.

s/ James Alexander Lewis, V  
James Alexander Lewis, V

Dated: February 19, 2019